

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JAMES ROBINSON,
On behalf of himself and all others similarly situated,

Plaintiff,

v.

NATIONAL STUDENT CLEARINGHOUSE,

Defendant.

Civil Matter No. 1:19-cv-10749

**ASSENTED-TO MOTION FOR EXTENSION OF TIME FOR DEFENDANT
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant National Student Clearinghouse ("Defendant"), by and through its undersigned counsel, hereby requests that it be granted an extension of time to respond to Plaintiff's Complaint up to and including **June 17, 2019**. In support of this request, Defendant states:

1. Plaintiff James Robinson's counsel assents to the requested extension.
2. The Parties' counsel plan to discuss this matter before Defendant responds to the Complaint.
3. The parties have not previously applied for any extensions of time.
4. This extension is requested in good faith and not for the purposes of delay.
5. No party will be prejudiced by the requested extension.

WHEREFORE, Defendant respectfully requests this Court to enter an order granting Defendant up to and including **June 17, 2019** to respond to Plaintiff's Complaint in this matter.

Dated: May 2, 2019

Respectfully Submitted,

**NATIONAL STUDENT
CLEARINGHOUSE**

By its attorney,

/s/ David G. Thomas

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*petition to appear *pro hac vice* forthcoming

LOCAL RULE 7.1(A)(2) CERTIFICATE

I hereby certify that counsel to all Parties conferred and have assented to the relief requested herein.

/s/ David G. Thomas

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent via U.S. first class mail to those indicated as non-registered participants on May 2, 2018.

/s/ David G. Thomas